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THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET NEW YORK, NY 10007 deadlines are adjourned. A status conference will take place May 20, 2022 at 10:00 a.m. The proposed case management plan and list of counsel are due by May 18, 2022 at 12:00 p.m. So ordered.

/s/ Alvin K. Hellerstein March 29, 2022

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March 29, 2022

VIA E.C.F. & FACSIMILE

Honorable Alvin K. Hellerstein United States District Judge United States District Court Eastern District of New York 500 Pearl St. New York, New York 10007

Fax: 212-805-7942

HON. SYLVIA O. HINDS-RADIX

Corporation Counsel

Re: Salsabil Chowdhury, et al., v. the City of New York, et al.,

21 Civ. 7271 (AKH) (SDA)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney representing the City of New York, Bill De Blasio, Dermot Shea, Terence Monahan, and Andrew LeBron (collectively, "Defendants") in the above referenced matter. The Defendants write to respectfully request (a) that the April 1, 2022 telephonic hearing be adjourned to either April 5, 6, or 12 due to a scheduling conflict, and (b) a corresponding adjournment of the March 30, 2022 deadlines to submit a proposed case management plan and list of all counsel expected to appear on the record. Defendants contacted Plaintiffs' counsel in order to obtain Plaintiffs' position on this request, but, to date, have been unable to reach him.

By way of relevant background, on March 25, 2022, the Court scheduled a telephonic conference for April 1, 2022, at 10 a.m., and directed the parties to, by "no later than March 30, 2022, at 12:00 p.m. [...] jointly submit to the court (via the email address HellersteinNYSDChambers@nysd.uscourts.gov) a proposed case management plan consistent with my Individual Rules and a list of all counsel expected to appear on the record, along with their contact information." (Dkt. No. 28.)

However, due to a scheduling conflict, the undersigned is unable to participate in a conference on April 1, 2022. Specifically, the undersigned will be out of town on April 1, 2022. Thus, on March 25, 2022, the undersigned immediately e-mailed Plaintiffs' counsel to

seek the Plaintiffs' position on the Defendants' instant request. After not receiving a response, on March 28, 2022, defense counsel again e-mailed and telephoned Plaintiffs' counsel, leaving a voicemail message. However, as of today, the undersigned has not received a response from Plaintiffs' counsel. Thus, the Defendants are unable to state Plaintiffs' position on the instant request.

Accordingly, the Defendants respectfully request that the Court reschedule the April 1, 2022 telephonic hearing to either April 5, 6, or 12.¹

The Defendants thank the Court for its consideration.

Respectfully submitted,

/s/ Nicolette Pellegrino Nicolette Pellegrino **Assistant Corporation Counsel** Special Federal Litigation Division

CC: VIA E.C.F. Brett Klein, Esq. Attorney for Plaintiffs

¹ Defense counsel respectfully notes that she is also unavailable to participate in a conference on April 4, 7, 8, and 15, 2022.